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Attorneys for Defendants, Walmart Inc. and Jetson Electric Bikes, LLC

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children and MATTHEW WADSWORTH,)))	Case No. 2:23-cv-00118-KHR
Plaintiffs,))	DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS
v.)	-
WALMART INC. and)	
JETSON ELECTRIC BIKES, LLC,)	
)	
Defendants.)	
)	

Pursuant to the Final Pretrial Order (ECF No. 166, p. 9), Defendants Walmart, Inc. and Jetson Electric Biles, LLC, by and through their undersigned counsel, submit the following voir dire questions to be asked of the potential jurors in the above-captioned matter.

- 1. What is your educational background? Do you hold any degrees, certificates, or licenses? If so, please explain.
- 2. If you are currently employed, what is your occupation? If retired or currently unemployed, and worked previously, what kind of work did you do?
- 3. Do any of you have any other reasons whatever, such as a physical defect, a health problem or home problems which might interfere with your serving as fair and impartial jurors in this case?
- 4. Have you, anyone in your immediate family, or anyone close to you ever participated in a lawsuit as a party or in any other capacity (such as a plaintiff, defendant, or witness)? If yes, please explain.
- 5. Have you served as a juror before? If so, please explain the type of case. For example, was it a civil or criminal case? Did you deliberate to a verdict? Were you the foreperson?
- 6. Have you, or to the best of your knowledge any member of your immediate family or anyone close to you, had any experiences or hold any opinions or views about Walmart that may impact your ability to be a fair and impartial juror? Please explain. *OR* Generally, what is your opinion of Walmart?
- 7. Do you have any strong opinions about large corporations, either positive or negative? Please explain.
- 8. Have you, or someone in your family, ever owned or operated a hoverboard? If so, do you know the make/model?
- 9. Have you had any experiences, read, heard, or seen anything which has led you to form any opinions about the safety of this type of product? *OR* Have you had any experiences, read, heard, or seen anything related to safety issues with this type of product? If yes, please explain.
- 10. Have you read, heard, or seen anything in the news, television, social media or elsewhere about the safety of lithium ion batteries? If yes, please explain. *OR* In general, how would you describe the safety of products which contain lithium ion batteries?
- 11. Do you have any opinions, either positive or negative, about the quality of products manufactured in China?
- 12. Have you ever purchased what you believed to be a defective product? If yes, please explain.
- 13. Have you or anyone close to you been injured due to what you believe was a defective product? If yes, please explain.

- 14. Are you related to or know anyone in the fire department? If so, please explain.
- 15. Are you related to or know anyone in law enforcement? If so, please explain.
- 16. Have you or anyone close to you ever had a fire on your property? If yes, do you know what the cause of the fire was?
- 17. Have you or anyone close to you ever suffered a burn injury? If yes, please explain what happened.
- 18. Do any of you or your close family members have previous legal experience which would include work as an attorney, law student or paralegal?
- 19. Do you have any specialized education, training, or experience in the following fields? [accident or fire investigation / design or engineering / quality control / medical or mental health / legal or law enforcement] If yes, please describe the education, training and/or experience.
- 20. Does any member of the panel, your immediate family, or anyone close to you know any of the attorneys involved in the case? If yes, please explain. Have you or any of your immediate family had any business dealings with or been employed by any of these attorneys or their respective law firms? If yes, please explain.
- 21. Does any member of the panel, your immediate family, or anyone close to you know any of the Plaintiffs (introduced by plaintiffs' counsel)?
- 22. Do you have any personal knowledge of this case? If yes, please explain.
- 23. Do you know any of the witnesses in this case? If yes, please explain.
- 24. Have you formed an opinion or initial impression about this case based on the brief description read to you that may keep you from being a fair and impartial juror? If yes, please explain.
- 25. Do any of you disagree with the notion that just because a lawsuit has been filed that does not indicate any wrongdoing on the part of the company being sued?
- 26. Do any of you feel if a person is responsible for an unfortunate circumstance, they should be held accountable for their role in whatever happened?

Dated this 24th day of February, 2025.

_/s/ _Holly L. Tysse_

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